

Registered Office:
Glenorchy
2 Zurich Avenue
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Staffs ST8 7FA
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Data Protection Policy

Policy information	
Organisation	Data Controller SMc Training Ltd
Scope of policy	<p>This policy applies to all of the work undertaken by SMc Training Ltd.</p> <p>This policy does not include any other Data Processors and all employees will follow the data protection policies of all companies it works in conjunction with.</p>
Policy operational date	29 th May 2018
Policy prepared by	Lynne Pickles – Data Protection Officer
Date approved by Managing Director	
Policy review date	29 th May 2019



Introduction	
Purpose of policy	<ul style="list-style-type: none"> • complying with the law • following good practice • protecting clients, staff and other individuals • protecting the organisation
Types of data	<ul style="list-style-type: none"> • Personal information - Identity data • Personal information – Contact data • Personal information – Financial data • SMc Training collects no sensitive data. <p>Sensitive Data refers to data that includes details your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, genetic and biometric data.</p>
Policy statement	<p>SMc Training is committed to:</p> <ul style="list-style-type: none"> • comply with both the law and good practice • respect individuals' rights • be open and honest with individuals whose data is held • provide training and support for staff who handle personal data, so that they can act confidently and consistently • Notify the Information Commissioner voluntarily, even if this is not required
Key risks	<p>Every effort is made by SMc Training Ltd to ensure that risk management is at the forefront of its everyday operations. The key risks are:</p> <ul style="list-style-type: none"> • Information being lost or stolen from company equipment and/or property. • individuals being harmed through data being inaccurate or insufficient.



Responsibilities	
The Board / Company Directors	Sue McGregor
Data Protection Officer	<p>Lynne Pickles responsibilities include:</p> <ul style="list-style-type: none"> • Briefing the Board on Data Protection responsibilities • Reviewing Data Protection and related policies • Advising other staff on tricky Data Protection issues • Ensuring that Data Protection induction and training takes place • Notification to the ICO • Handling subject access requests • Approving unusual or controversial disclosures of personal data • Approving contracts with Data Processors
Employees & Volunteers	All staff and volunteers are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work. (From now on, where 'employees' is used, this includes both paid employees and volunteers.)
Enforcement	SMc Training Ltd will only issue enforcement penalties under the guidance of the ICO.



Security	
Scope	<p>The scope of this policy covers all personal / business data held by SMc Training Ltd.</p> <p>This includes:</p> <ul style="list-style-type: none"> • Personal information - Identity data • Personal information – Contact data • Personal information – Financial data • SMc Training collects no sensitive data.
Setting security levels	<p>All of the personal data held by SMc Training Ltd is held to the same rigorous levels of security. This includes locked filing cabinets, encrypted software / data sticks.</p>
Security measures	<p>All documents containing personal information are password protected.</p> <p>All access to software and hardware for SMc Training Ltd is also password protected.</p>
Specific risks	<p>Working from home – The computer / laptop and Mobile phone is all password / number protected and encrypted.</p> <p>Working with individual clients – Clients have the final decision where activities are held and information is shared, to ensure security is not breached. Any hand-written notes are then formatted on the computer with the full protection as per all company activities. This data is always agreed by the client. The hand-written notes are then shredded with a cross shredded and disposed of.</p> <p>Working for a secondary company as an associate – Any correspondence sent by third party companies is kept on the encrypted computer. SMc Training Ltd will always follow third party company policies.</p> <p>Phishing – This is immediately reported to Fraud Alert.</p> <p>Taking information over the telephone / mobile – Paper notes are made during and after a telephone conversation and are held until the initial meeting. They are then shredded. During an initial meeting, after a referral identify is checked via photo identification.</p> <p>All telephone conversations are held in a private area so there is no risk of data breach.</p>



Data recording and storage	
Accuracy	Data is only collected from the primary source. All personal information will be verified by the primary source via email and/or a written letter.
Updating	Data is checked annually - updating or discarding old data. Financial data will be held for 6 years due to regulations. This will then be destroyed.
Storage	All sensitive information is held on a central computer system at SMC Training Ltd base of operations. This is encrypted and password protected. Any paper copies of documents are kept in a locked cabinet.
Retention periods	<p>SMC Training Ltd will only retain personal data for as long as necessary to fulfil the purposes of collection, including for the purposes of satisfying any legal, accounting or reporting requirements.</p> <p>To determine the appropriate retention period for personal data, SMC Training Ltd considers the amount, nature and sensitivity of the personal data; the potential risk of harm from unauthorised use or disclosure of personal data; the purposes for which SMC Training Ltd processes personal data and whether this can be achieved through other means and the applicable legal requirements.</p> <p>By law SMC Training Ltd will keep basic information about customers and invoiced training and coaching work provided (including Identity, Contact, Financial and Transactional data) for six years after they cease being customers for tax purposes.</p>
Archiving	As per retention.

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Right of Access	
Responsibility	Sue McGregor – Primary Lynne Pickles - Secondary
Procedure for making request	<p>At any point an individual can make a request relating to their data and SMC Training Ltd will provide a response with 30-days (1 month).</p> <p>Please note, we will always try to respond to all legitimate requests within 30-days. Occasionally it may take us longer than 30-days if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.</p> <p>All requests must be made in writing to the company director.</p> <p>Any legal advice is sort if necessary: https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-of-access/</p>
Provision for verifying identity	All data requests will be made through the company director, who has personal dealings with all companies and clients. Additional identification made be requested if the DPO has been asked. This will include two forms of identification (passport / driving license / recent bill with address)
Charging	No fee will be payable to access personal data (or to exercise any other rights). However, there may be a charge of a reasonable fee if requests are clearly unfounded, repetitive or excessive. Alternatively, SMC Training Ltd may refuse to comply with requests in these circumstances.



Transparency	
Commitment	SMc Training Ltd is committed to ensuring that all parties are fully aware of the Privacy and GDPR Policy. It will be provided on initial contact and then again if requested by each party.
Procedure	The Data Protection Policy, Privacy and GDPR Policy is available: <ul style="list-style-type: none"> • on the web site www.smctraining.org.uk • It is also available as a PDF document on request
Responsibility	Sue McGregor

Lawful Basis	
Underlying principles	Data will be collected in order for SMc Training Ltd to deliver training or coaching. The types of data include: Identify Contract Financial for the lawful purpose of completed the contracted work. SMc Training Ltd will not share your personal data with any third party for marketing purposes.
Withdrawing consent	An individual can request deletion of personal data where there is no compelling reason for its continued use. However, SMc Training Ltd has a legal duty to keep certain records for a reasonable time (e.g. financial records held for up to 6-years for tax and accounting purposes, before they need to be erased). This data is archived in a locked, fireproof cabinet and shredded after the legal retention period.

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Policy review	
Responsibility	Sue McGregor / Lynne Pickles
Timing	Annually To be completed by: 29th May 2019

This policy was written by SMC Training Ltd
Policy date: 29th May 2018